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August 14, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Aragon v. Brahspati, Inc., et al.
Case No.: 1:22-cv-6342 (EK) (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully request an extension of time to submit a revised settlement agreement. Pursuant to ¶ IV(B) of this Court's Individual Practice Rules, Defendants submit that: (i) the deadline to submit a revised settlement agreement is today, August 14, 2024; (ii) the reason for the request is because your undersigned was unable to review Plaintiff's proposed revised agreement due to an all-day hearing before the New York State Industrial Board of Appeals on Monday, August 12, 2024 and a settlement conference before this Court in another matter yesterday; (iii) there have been several previous requests for an extension of this deadline, all of which were granted (some *sua sponte* without a request, with gratitude from your undersigned and apologies); (iv) Plaintiff consents to this request; and (v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists both good cause and excusable neglect such that this Court should exercise its discretion in favor of granting the requested extension of time. Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
August 14, 2024

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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